



Law Office of Kristopher E. Twomey, P.C.  
LoKT Consulting

March 12, 2007

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, N.W.  
Washington, DC 20554

**Re: New Frontiers Telecommunications, Inc. System Security and  
Integrity Plan, ET Docket No. 04-295**


Dear Secretary Dortch:

Attached, pursuant to 47 C.F.R. § 1.20005, please find an original and four copies of the System Security and Integrity ("SSI") Plan filed on behalf of New Frontiers Telecommunications, Inc. This cover page will also be filed on ECFS without the SSI Plan.

New Frontiers Telecommunications, Inc. seeks confidential treatment for this submission pursuant to Section 0.459 of the Commission's rules. 47 C.F.R. § 0.459. The information submitted herein includes a description of policies and procedures for meeting the needs of law enforcement as well as personal employee contact information, and thus should be exempt from disclosure under Sections 0.457(f) and (g) of the Commission's rules. *Id.* §§ 0.457(f)-(g). For similar reasons, the Commission has indicated in the past that it would not make information related to CALEA compliance routinely available to the public.<sup>7</sup> Public knowledge of these procedures could interfere with enforcement efforts and public safety, as well as permit an unwarranted invasion of privacy of our employees. *See id.* New Frontiers Telecommunications, Inc. has not disclosed the information contained in this submission to the public at large, and will disclose the information only on a limited basis to third parties, and only for the purpose of assisting with lawfully ordered surveillance and information requests. Thus, the Commission should treat this System Security and Integrity Plan as confidential.

If you have any questions regarding this matter, please contact the undersigned.

Sincerely,

  
Kristopher E. Twomey  
Regulatory Counsel

Enclosures

cc: David Ward, Senior Legal Advisor, Policy Division, Public Safety and Homeland Security  
Bureau, FCC (via email)

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<sup>7</sup> Public Notice, CALEA Section 103 Compliance and Section 107(c) Petitions, CC Docket No. 97-213, FCC 00-154, at ¶ 12 (rel. Apr. 25, 2000).